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5 *JAMES JI ENTERPRISES, INC. ET AL.*

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DISTRICT COURT
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7 **IN THE DISTRICT COURT OF GUAM**

9 ALICE N. SALAS,

11 Plaintiff,

12 v.

13 JAMES JI ENTERPRISES, JJ PACIFIC
14 DEVELOPMENT CORPORATION,
JAMES JI AND HYUNG LEE,

16 Defendant.

CIVIL CASE NO. CV02-00002

12 **DEFENDANTS' PRETRIAL DISCLOSURES
PURSUANT TO RULE 26(a)(3)**

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19 Come Now, the Defendants James Ji Enterprises, JJ Pacific Development Corporation, James
20 Ji and Hyung Lee, through counsel undersigned, and make the following Pretrial Disclosures
21 pursuant to F.R.C.P. 26(a)(3).

22 **I. WITNESSES**

23 The Defendant believes that the following individuals have knowledge about the claims and
24 defenses in the above entitled action.

25 1. Alice Salas.

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ORIGINAL

- 3
- 4 2. Hyung Lee.
- 5 3. Felix Pangelinan.
- 6 4. Bennett Garcia.
- 7 5. James Ji.
- 8 6. Ann Cruz.
- 9 7. Jaime, the Defendant's office secretary.
- 10 8. George Salas.
- 11 9. John Hudnall.
- 12 10. Mr. Cheisman.

13 **II. EXHIBITS**

- 14 1. All deposition exhibits of November 22, 2002, including but not limited to, "A", "B",
- 15 "C" with its sub-exhibits "1", "2", "3" and "4", "D", "E", "F", "G", "H" and "I".
- 16 2. Copies of payroll checks received by Plaintiff Salas.
- 17 3. Plaintiff's letter of resignation;
- 18 4. Receipt reflecting settlement payment of \$6,000.00;
- 19 5. Statement of settlement executed by Plaintiff
- 20 Dated this 17th day of March, 2003.

21 Respectfully submitted.

22 **BERMAN O'CONNOR MANN & SHKLOV**
23 Attorneys for Defendant *JAMES JI*
ENTERPRISES, INC. ET AL.

24 By: 

25 **MONICA VALLE**
26 **DANIEL J. BERMAN**

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